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December 1, 2016

Dr. Adalberto Bosque
Remedial Project Manager
U.S. Environmental Protection Agency
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PROJECT: EPA Region 2 RAC2 Contract No.: EP-W-09-002
Work Assignment No.: 063-RICO-02YP

DOC. CONTROL NO.: 3323-063-03056

SUBJECT: Response to Comments
Draft Quality Assurance Project Plan Addendum #1
San German Groundwater Contamination Site
Operable Unit 2
Remedial Investigation/Feasibility Study
San German, Puerto Rico

Dear Dr. Bosque:

CDM Federal Programs Corporation (CDM Smith) is pleased to submit an electronic copy of the Response to Comments on the Draft Quality Assurance Project Plan (QAPP) Addendum# 1 received on November 29, 2016 for the San German Groundwater Contamination Site, OU2 in San German, Puerto Rico.

Please confirm receipt of the document and if you have any questions regarding this submittal, please contact me at your earliest convenience at (787) 722-5406.

Very truly yours,

CDM FEDERAL PROGRAMS CORPORATION

Michael Valentino, P.G.
Site Manager

Attachment

cc:	H. Eng, EPA Region 2 (letter only)	J. Oxford, CDM Smith (e-mail)
	S. Lopez- Luna, EPA Region (e-mail)	F. Delano, CDM Smith (e-mail)
	J. Litwin, CDM Smith (letter only)	RAC2 Document Control
	B. MacDonald, CDM Smith (letter only)	



Response to Comments

Draft Quality Assurance Project Plan Addendum #1

Measurement/Data Acquisitions Elements

12. Worksheet #17

- This worksheet should be limited to documenting the sampling design and the rationale for selecting the sample number and location. Information that is included in SOPs or other documents should not be restated here, instead references should be given.

CDM Smith Response: The Technical SOPs required for each worksheet are referenced after the task description is provided. The Technical SOPs required for each worksheet are listed at the bottom of the worksheet. The information included is useful to our project teams in understanding the scope of each task.

- If MNA is being considered in the remediation strategy for this site, biodegradation information such as whether Dehalococcoides-like microorganisms are present and possibly molecular environmental diagnostic tools such as CSIA should be considered.

CDM Smith Response: The scope for this site has already been approved; we will take this application into consideration during Remedial Design Phase.

Data Review Elements

28. Worksheet #37

- This worksheet is site specific and, as such, it should be included in this submission. An explanation on how the data will be assessed to ascertain that it is of sufficient quantity and quality to meet the project's goals should be provided. The 5-step EPA data usability assessment process should be followed and documented as it applies to this project.

CDM Smith Response: Worksheet 37 will be incorporated into the final QAPP submittal.